

current NPA relief coordinators. Affected party information will be updated on an ongoing basis by the RNRCs. The new NANPA web site will encourage new service providers to get themselves on the list and to participate in NPA relief activities.

For each NPA requiring relief, the RNRC will prepare and distribute an Initial Planning Document (IPD) that identifies the various relief options, e.g., splits and overlays, and provides an assessment, e.g., advantages/disadvantages, relief periods, etc., of each option. Bellcore has reviewed many relief plans in the assignment of NPA's since 1984, and is quite familiar with the relief options and the format and content of relief planning documents. A proposed schedule of events will be established by the RNRC at this time, including when relief should take place to prevent jeopardy, and the IPD will also include the dates for future industry meetings that will be held to discuss the relief options. The ultimate goal of the meetings will be to reach industry consensus and regulatory approval, if required. The RNRC will formally notify all affected parties of NPA relief meeting details in the IPD on a single plan well in advance of the relief date.

The RNRC will moderate the NPA relief meetings, including: issuing meeting announcements, coordinating meeting arrangements, leading the meeting, issuing meeting minutes, and other duties necessary to conduct the meetings. Consistent with administrative procedures in use today for industry form and committee meetings, the costs of the meetings will be shared equitably by the participants. In situations where local regulators choose to perform some of these activities, the RNRC will provide all necessary support to these efforts as required or requested. Again, costs for

meetings conducted by local regulators will not be covered by NANPA, Inc. but will be shared by the participants. Other duties the RNRC will perform regarding the industry meetings include:

- a) Identification of all possible NPA relief options proposed at the meetings, e.g., alternate split options, including the approximate boundaries for split and/or boundary realignment options, estimated life spans of the NPA(s), impacts of each option, i.e., advantages/disadvantages, and other impacts related to dialing and permissive dialing requirements.
- b) Submittal to the appropriate regulatory authority of the results of the industry meetings, including the details of the relief plan in the case where consensus was achieved. If consensus could not be reached, the RNRC will report the progress that was made and will request assistance in reaching a final resolution. Comments from all participating parties will be forwarded to the regulators for consideration.

If requested, the RNRC will attend hearings and provide testimony about the NPA that is exhausting, i.e., the record of industry and public meetings and details of the relief options. Costs associated with hearings, such as meeting rooms, audio/visual equipment, customer surveys, maps, etc., will not be covered by NANPA, Inc., but will either be shared by industry participants or funded in some other mutually agreeable manner. If requested, NANPA, Inc. could provide some of these services, e.g., preparation of maps, as enterprise services.

The RNRC will assign the NPA relief code in accordance with the approved relief plan and in accordance with applicable assignment guidelines. In those situations where a conflict exists between the final approved plan and some elements of the guidelines, it may be necessary to raise the conflict to either the INC or the NANC.

After the relief NPA has been assigned, the RNRC will provide industry notification of NPA code relief activities as directed in the NPA Relief Planning Guidelines. Industry notification includes provision of adequate advance notice, public announcements, and publication of Planning Letters. The Planning letters will include information such as the relief date, end date of permissive dialing, new dialing plans, maps, CO code lists in the case of splits, contacts for reporting troubles, and other important notification information. Planning Letters will be downloadable from the web site, and paper copies will be available by subscription, as described in Section 7 of this proposal.

With input and approval of the industry, the RNRC will issue a press release announcing the details of a new NPA relief plan. The RNRC will respond to requests by the media and the public for information concerning NPA relief activity. The announcement of the new NPA will then immediately appear on the web site.

Subsection 13 of Section 5.2.4 of the Requirements Document specifies that assistance shall be provided to the NASC (now called the SMS800 Help Desk). Currently, this assistance consists basically of the information contained in the NANPA Planning Letters for use by the SMS800 Help Desk to assure new NPAs are incorporated in the 800/888 databases. Consequently, NANPA, Inc.

will provide this and any other necessary information to the SMS800 Help Desk concerning the assignment of new NPAs.

### **5.2.5 Jeopardy NPA Processes**

#### **Overview of Operations**

NANPA, Inc. will perform the jeopardy NPA processes described in this section of the Requirements Document by dividing the jeopardy effort between the CAAB and the RNRCs in the following manner. The CAAB will keep track of all NXX assignments for each NPA and will provide monthly reports of these assignments to the responsible RNRC. The RNRC will compare the NXX assignment rates in these reports with appropriate COCUS forecasts for each NPA in their region to determine the status of NPA exhaust, e.g., if assignment rates are high, low, or on target. Based on this analysis, the RNRC will determine when an NPA is in jeopardy as defined in the CO code assignment guidelines, and then promptly notify the industry and the public.

For each NPA in jeopardy, the RNRC will publicly announce the jeopardy situation by means of a Planning Letter, will inform the appropriate regulators, and will plan and conduct the necessary meetings to develop code conservation and extraordinary NPA specific conservation procedures, according to the CO code assignment guidelines. Meeting participants will be advised that meeting expenses, e.g., meeting room, audio/visual equipment, etc., will be covered by the attendees on a

shared basis. Special CO code conservation procedures developed at these meetings will be implemented by the CAAB.

Extraordinary NPA specific conservation procedures, if developed by the industry as a result of the industry meetings, will be published by the RNRC in a Planning Letter as specified in Section 8.5 of the CO code assignment guidelines. These extraordinary NPA specific conservation procedures will be implemented by the CAAB as part of the CO code request process, e.g., implementation of a lottery method of assigning NXXs.

The following Statement of Performance is a description of how NANPA, Inc. proposes to satisfy the requirements of Jeopardy NPA Processes described in subsections 1 through 6 of the Section 5.2.5 of the requirements document. All requirements described in this section have been included in this proposal and will be performed by NANPA, Inc. as specified.

#### **Statement of Performance**

NANPA, Inc. will follow applicable criteria in the CO code assignment guidelines in regards to jeopardy NPA situations. In addition, the following steps will be taken to satisfy specific jeopardy NPA processes.

The RNRC will closely monitor NXX assignments in NPAs in their region that are nearing exhaust. These NPAs may or may not have an approved NPA relief plan in place. Each month, for NPAs nearing exhaust, the RNRC will compare the NXX assignment rates provided by the CAAB with

the most recent COCUS forecasts. The RNRC will call upon any available information that might provide additional insight into the status of numbering demand in the NPAs. Combining this information, the RNRC will declare a jeopardy situation when it is clear that an approved relief plan or a proposed relief plan will not provide the planned relief in time to prevent exhaust of the NXXs.

The RNRC will notify the appropriate regulatory authorities and affected parties within the NPA of the jeopardy status and announce the special conservation procedures will be invoked in accordance with Section 8 of the guidelines. As previously mentioned, affected party names and contact information will be obtained from current administrators during the transition plan described in Section 5.3. A NANPA Planning Letter will be published to announce the jeopardy status of the NPA. The CAAB will be advised of any special conservation procedures that will impact the CO code request process.

The RNRC will schedule and conduct jeopardy NPA industry meetings in the respective NPA. This will include: issuing meeting announcements, coordinating meeting arrangements, leading the meeting, issuing meeting minutes, and other duties necessary to conduct the meeting. As with other meetings sponsored by the RNRC, costs of the meetings will be shared by the participants. The RNRC will also request, collect, and compile jeopardy COCUS forms for each jeopardy NPA. During the meetings, the RNRC will lead discussions of possible extraordinary NPA specific conservation procedures that may be invoked if special conservation procedures are insufficient.

The CAAB will apply any special conservation procedures announced by the RNRC and will closely monitor, publish, and each week forward to the RNRC the assignment rates for all NPAs that are in jeopardy. If it appears that the special conservation measures will fall short, and it is likely that exhaust will occur before the relief date, the RNRC will declare that the industry-approved extraordinary NPA specific measures will be invoked. If the industry has not approved extraordinary NPA specific conservation measures, the RNRC will schedule and conduct additional jeopardy NPA meetings to develop these measures, using the procedures for the conduct of meetings described above.

The RNRC will advise local regulators and affected parties in the NPA that extraordinary NPA specific conservation measures are necessary to prevent NPA exhaust, and will request regulatory approval, if required. The RNRC will publish a Planning Letter advising the public that extraordinary NPA specific conservation measures are being invoked. With the publication of this Planning Letter, the CAAB will apply these criteria in the CO code request process for CO codes in the affected NPA.

### **5.3 Central Office Code Transition**

#### **Overview of Operation**

The Requirements Document specifies the CO code administration function must be transferred to the new NANPA in no more than 18 months after the new NANPA has assumed the functions of

the current NANPA. Accomplishing this task will take careful planning, so as not to disrupt the current code assignment and NPA relief planning processes. In addition, the industry has asked for a description of how costs will be allocated during the transition to cover start-up costs and the charging of costs only for work that has been transitioned from the current administrators.

Keeping these concerns in mind, Bellcore has developed a straw proposal for transitioning the CO code administration activity into the new NANPA within the prescribed 18 month period. The pricing for CO code transition contained in this proposal is based on the straw proposal described below. It is recognized, however, that the NANC CO Code Transition Task Force and the new NANPA will jointly develop a Transition Plan within 60 days after the new NANPA is selected, and that NANC approval of the plan will be required. If selected, NANPA, Inc. will work with the Task Force to develop a mutually acceptable Transition Plan and will implement that plan.

The transition plan that follows describes how CO code request processing and NPA relief planning will each be transitioned during the 18 month period beginning 90 days after the new NANPA has been selected. The transition plan is basically as follows:

- The first 12 weeks will be set aside to assemble the "start-up" staff for the CAAB and the RNRC and set up office space (location, furniture, computers, files, copying, etc.) and communications systems (phones, fax, electronic mail, web site, etc.).



- Administrative systems for the assignment of CO codes will be established, tested and readied within this 12-week period. The CAAB “start-up” staff will be trained in the use of the guidelines, RDBS/BRIDS, the new administrative systems, etc.
- Also during the 12-week period, the RNRC staff will begin the transition with training on the use of the NPA relief guidelines, becoming familiar with current and future NPA relief plans, planning how future NPA relief plans will be approached, etc.
- The transition of CO code request processing is planned to take place in six segments over the remaining 60 weeks in a manner based proportionately on the assignment rates of NXX codes as shown in Attachment 2 of the Requirements Document and described later in this proposal. The 60 week period will be divided into 6 periods of 10 weeks each. During each ten week period, transition activities for each segment will include the transfer of all information requested in Section 5.3.2 of the requirements document, data entry of relevant information into the NANPA, Inc. administrative systems, a period of overlap of assignment responsibility between the existing administrator and the CAAB in order to gain practical assignment experience, and finally, the full transition of assignment responsibility to the CAAB and the withdrawal of the existing administrator. Each transition segment will be accomplished in the same manner. Although the time planned to perform the transition of each segment is the same, the intervals can be modified, as experience dictates, as long as all transitions are accomplished in the 60-week period.

- In a similar manner, NPA relief planning will be transferred to NANPA, Inc. in the same six 10-week segments as defined above for CO code request processing. During each 10 week period, transition activities for each segment will include the transfer of all information requested in Section 5.3.2 related to NPA relief planning activities, a period of overlap of NPA relief planning activities between the current relief coordination staff and the RNRC to gain first hand experience and, finally, the full transition of NPA relief planning responsibility to the RNRC and the withdrawal of the current relief coordinator.
- As the workloads of the CAAB and the RNRC gradually increase with the transition of each segment, the staff of the CAAB and the RNRC will gradually be increased as well as described below.

The following Statement of Performance is a description of how NANPA, Inc. proposes to satisfy the requirements of CO Code assignment transition as described in Sections 5.3.1 of the Requirements Document. All requirements described in this section have been included in this proposal and will be performed by NANPA, Inc. as specified.

### **5.3.1 Basic Planning Information**

#### **Statement of Performance**

The following sections describe the NANPA, Inc. proposal to transition CO code request processing (Section A) and NPA relief planning (Section B) to NANPA, Inc. and meet the requirements described in Section 5.3.1 of the Requirements Document.

#### **A. Transition of CO Code Request Processing**

NANPA, Inc. will complete the transition of the CO code request processing function within 18 months after it has assumed all of the current administrator's functions. The following straw proposal is offered as a transition plan to accomplish this requirement.

- a) During the first 12 weeks Bellcore will establish a start-up staff of 5 people, to set up office space, furniture, computer equipment, files, etc. and to begin training for transition. The start-up staff will consist of the following people, which represents a subset of the steady-state staff already described in Section 5.2.2:

<b>CO CODE REQUEST PROCESSING START-UP STAFFING</b>	
<b>Title/Function</b>	<b>Staff</b>
Director - CO Code Administration	1
Code Administrator	2
Database Administrator	1
Staff Associate	1

- b) Administrative systems used to process applications as described in Section 5.2.2 will be established, tested, and made ready when the first CO code applications are processed. These

will be the tools and processes associated with performing CO code administration. NANPA, Inc. may choose either to acquire one of the software systems currently in use, or to build its own database to store CO code assignment information.

- c) Communications systems will be established such as the central and regional contact numbers , electronic mail, telephones, fax, Planning Letter and other publication processes, web site modifications, etc.
- d) All start-up staff members will be trained in relevant CO code historical background, industry forums and processes, use of the CO Code Assignment Guidelines, NPA Relief Planning Guidelines, and other relevant industry documents, methodology for data entry into RDBS/BRIDS, use of CO code job aid, etc. For maximum flexibility, staff members will be cross trained to assume each other's job functions, as necessary.
- e) Planning for the transition of CO code request processing will be completed during the initial 12-week period. The workload of the existing CO code administrators has been divided into six segments based on volume of code requests as described below. One of these segments will be selected as the first to be transitioned. The appropriate administrator(s) will be contacted from this segment and the information necessary to transition CO code request processing as described in Section 5.3.2 will be requested. The existing administrator will be contacted sufficiently far in advance to allow time to provide the required information prior to the first week of the transition of the segment.

The complete transition of CO code request processing will take place over the next 60 weeks in 6 equal segments with the size of each segment based on the number of CO code requests as reported by the current code administrators. Thus, segments will be transitioned in 10-week periods. The transition of NPA relief planning, described in the Section B, will be coordinated with the transition of CO code request processing, i.e., the transitions will occur in the same segments or regions. The segments are described in the following table and listed in alphabetical order by company. The exact order of transition of the segments will be finalized by the NANC Transition Task Force, the new NANPA and the existing administrators.

CO CODE ADMINISTRATION TRANSITION SEGMENTS		
Segment	Approx. No. of CO Codes	Percent of CO Codes
Ameritech & NYNEX	1,600	17
Bell Atlantic	1,400	15
BellSouth	2,000	21
Pacific Bell	1,400	15
Southwestern Bell	1,500	15
US WEST & Others*	1,600	17

\* GTE, SNET, CBT, Alascom, PRTC, and those remaining in the 809 NPA

During each 10-week transition period, the following activities will take place:

1. During the first week, all relevant records will be collected from the existing CO code administrator(s).
2. During the next 2 weeks, all required information will be entered into the appropriate administration systems. Code administrators and database administrators will receive training from the current administrator on the assignment of codes in their region.
3. During the next 3 weeks, the responsibility for assignment of CO codes by the existing CO code administrator and by NANPA, Inc., CAAB will overlap as these groups work side-by-side in the assignment of codes. During this period, which will probably involve an average of about 100 applications, the existing code administrator will work with and advise the CAAB on the code requests for their region. This on-the-job experience will include such things as tracking of cross-boundary local calling requirements, identification of local calling areas and knowledge of specific local and toll dialing plans within the states. Any special circumstances concerning the entry of information into RDBS/BRIDS will be identified during this period.
4. During the next 4 weeks, all CO code request processing for this segment will be transferred to the CAAB, with the existing code administrator being available to answer questions, as requested.

As the work transfers to the CAAB in segments as described above, the staff will be increased proportionately to handle the increased work load. The following table summarizes how the staff

will be increased and also shows the schedule for handing off the CO code request processing to  
NANPA, Inc.

From this table it can be seen that initial costs for CO code request processing action will be assessed for a start up staff of 5 people. Costs will be increased as additional staff is added to reflect the increase in work load. By segment number 5 one CAAB staff level will be at the steady state or maximum level of 10 people.

<b>GROWTH OF CAAB STAFF DURING TRANSITION</b>								
		<b>Growth by Segment</b>						
<b>Title/Function</b>	<b>Start-up</b>	<b>#1</b>	<b>#2</b>	<b>#3</b>	<b>#4</b>	<b>#5</b>	<b>#6</b>	<b>Total</b>
Director - Code Administration	1							1
Code Administrator	2		1	1	1	1		6
Database Administrator	1			1				2
Staff Associate	1							1
<b>Schedule (Weeks) ⇒</b>	<b>12</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>72</b>

## B. Transition of NPA Relief Planning

NANPA, Inc. will complete the transition of NPA relief planning within 18 months after it has assumed all of the current administrator's functions, i.e., 90 days after selection. The following straw proposal is being offered as a transition plan to accomplish this requirement.

- a) During the first 12 weeks the new NANPA will establish a start-up staff of 6 people in three RNRCs, to set up office space, furniture, computer equipment, files, etc. The start-up staff is shown in the following table which represents a subset of the steady-state staff described in



Section 5.2.4. One NPA Relief Coordinator will be needed to set up each of the three RNRCs.

NPA RELIEF PLANNING START-UP STAFFING	
Title/Function	Staff
Director - NPA Relief Coordination	1
NPA Relief Coordinator	3
Assistant NPA Relief Coordinator	1
Staff Associate	1

- b) Communications systems will be established, including the regional contact telephone numbers, email, fax, document publication processes, and modification of web site.
- c) The start-up staff will be trained in NPA assignment history, industry forums and processes, status of recent NPA relief activities, industry administrative guidelines, regulatory procedures, the NANC, the role of the FCC, Industry Canada, etc.
- d) Planning for the transition of NPA relief planning will be completed during the initial 12-week period. A segment will be selected as the first to be transitioned as described above. This segment will be the same segment that is selected for the transition of the CO code request processing. The current relief coordinator(s) will be contacted from this segment and the information necessary to transition NPA relief planning as described in Section 5.3.2 will be requested. The existing NPA relief coordinators will be contacted sufficiently far in advance

Section 5.2.4. One NPA Relief Coordinator will be needed to set up each of the three RNRCs.

<b>NPA RELIEF PLANNING START-UP STAFFING</b>	
<b>Title/Function</b>	<b>Staff</b>
Director - NPA Relief Coordination	1
NPA Relief Coordinator	3
Assistant NPA Relief Coordinator	1
Staff Associate	1

- b) Communications systems will be established, including the regional contact telephone numbers, email, fax, document publication processes, and modification of web site.
- c) The start-up staff will be trained in NPA assignment history, industry forums and processes, status of recent NPA relief activities, industry administrative guidelines, regulatory procedures, the NANC, the role of the FCC, Industry Canada, etc.
- d) Planning for the transition of NPA relief planning will be completed during the initial 12-week period. A segment will be selected as the first to be transitioned as described above. This segment will be the same segment that is selected for the transition of the CO code request processing. The current relief coordinator(s) will be contacted from this segment and the information necessary to transition NPA relief planning as described in Section 5.3.2 will be requested. The existing NPA relief coordinators will be contacted sufficiently far in advance

to allow time to provide the required information prior to the first week of the transition.

The transition of NPA relief planning will take place over the next 60 weeks in the same 6 equal segments as described above in the transition of CO code request processing. CO code administration transition will be coordinated such that CO code request processing and NPA relief planning will be transitioned at the same time in the same segment.

During the 10-week transition period for each segment, the following activities will take place related to NPA relief planning:

1. During the first week, all relevant records will be collected from the existing NPA relief coordinator(s).
2. During the next 2 weeks, start-up relief coordinators will be trained in the use of the NPA relief planning guidelines, the NPA assignment guidelines, and other relevant procedures, and will become familiar with past, current and planned NPA relief activities in the NPAs in the segment that will be transitioned, and will become familiar with the regulatory environment in the segment.
3. During the next 3 weeks, the responsibility for assignment of NPA relief planning by the existing relief coordinators and by the RNRCs will overlap as these groups work side-by-side in performing NPA relief planning. During this period, the current NPA relief coordinators

will provide on-the-job training and advise the RNRC staff on the details of relief activities in their region.

4. During the next 4 weeks, NPA relief planning activities in the segment will be transferred completely to the RNRC, with the existing NPA relief coordinators being available to answer questions, as requested.

As the work transfers to the RNRC in segments as described above, the staff will be increased proportionately to handle the increased work load. The following table summarizes how the RNRC staff will be increased and also shows the schedule for handing off NPA relief planning to the new NANPA.

GROWTH OF RNRC STAFF DURING TRANSITION								
Title/Function	Start-up	Growth by Segment						Total
		#1	#2	#3	#4	#5	#6	
Director - NPA Relief Coordination	1							1
NPA Relief Coordinator	3			1	1	1		6
Assistant NPA Relief Coordinator	1			1		1		3
Staff Associate	1					1		2
<b>Schedule (Weeks) ⇒</b>	12	10	10	10	10	10	10	72

### 5.3.2 Process for Transferring Supporting Confirmation

Section 5.3.2 of the requirements documents requests a demonstration on the new NANPA's ability and description of the processes to be used for coordination with existing CO code administration in the U.S. for the transfer of supporting information. In the transition plan described above for the CO code request processing and NPA relief planning, procedures have been described to request the listed information in Section 5.3.2 during each phase of the transition plan. Local administrators will be provided a checklist of the information to be provided and a schedule for transmitting this information to the new NANPA. For example, during the first 12 weeks, when CAAB and RNRC personnel are setting up office space, establishing appropriate staff levels, providing training, etc., the first segment selected for transition will be requested to collect the appropriate information shown on the checklist and forward this to the CAAB and RNRC at a specified time period. Existing CO code administrators and NPA relief coordinators that will be

participating in the transition of their work to NANPA, Inc. will be requested to be identified to assist in the transition schedule at this time as well. The information on the checklist will include:

- Copies of all CO code requests received after the start of transition. This will also include open CO code requests and their status.
- Non-proprietary assignment status information for all CO codes in all NPA's.
- Historical summaries of assigned CO codes quantities for the last 5 years.
- Detailed information pertaining to local calling areas.
- Detailed information regarding specific assignment limitations such as those resulting from cross-boundary local calling network capabilities, etc.
- Contact lists of key personnel involved with the resolution of routing problems.
- Most recent area code exhaust projections and methodologies used to project exhaust.
- Complete mailing lists of industry members affected by ongoing area code relief projects.
- Copies of all industry minutes, regulatory filings, and non-proprietary planning data relating to ongoing area code relief projects.

The information provided by the current CO code administrators and NPA relief coordinators will be checked for accuracy and completeness with known databases and other available information.

The current code administrators and NPA relief coordinators will be responsible for providing reliable and accurate information and will be asked to review and resubmit information that appears inaccurate or incomplete.

## 6. Dispute Resolution

As stated in the Requirements Document, disputes can originate primarily from three situations:

1. The day-to-day performance of the NANPA responsibilities, e.g., a resource applicant's disagreement regarding the NANPA's assignment or denial of a NANP resource assignment.
2. From industry forum or NANC activities, e.g., the potential for a "non-consensus" declaration regarding the resolution of a numbering policy issue or the content of resource assignment guidelines.
3. From a dispute between the various national regulatory authorities of the NANP countries, e.g., the need to accommodate unique national requirements while not compromising the uniformity of the NANP format, use, and administration.

The role of a competent and effective NANPA is to first minimize disputes by understanding, properly interpreting, and adhering to all aspects of existing assignment guidelines in the administration of NANP resources. In order to accomplish that goal, the best tool is a working knowledge of the history, intent, and textual details of these guidelines. Bellcore's knowledge, and role in the development of each NANP resource assignment guideline is unmatched by any North American entity. Such knowledge and expertise will minimize the number of conflict resolution cases that the NANC, INC, FCC, and Industry Canada will have to resolve as part of the dispute



resolution process's escalation procedures by avoiding them to start off with or by resolving them at the first phase of any dispute resolution process - the review phase, when administrator and appellant revisit the decision/situation that caused the dispute. Such early detection and resolution of disputes will save the time and effort of the entire telecommunications sector.

Regarding day-to-day NANPA assignment disputes, Bellcore, as the current NANPA, has been successfully resolving these types of disputes with carriers and service providers from all sectors of the telecommunications industry and all NANPA countries for 14 years. Such negotiation skills come only with experience and are very valuable to the entire industry when used routinely by the NANPA.

Disputes regarding industry forum and NANC activities will require, as stated in the Requirements Document, the new NANPA to "... provide guidance and historical data." Bellcore, as the current NANPA has been assisting the industry forums, by actively participating in, advising on, and leading contentious industry discussions to successful conclusion, thereby once again minimizing those instances where a dispute resolution process, such as with a non-consensus declaration, might be required. The providing of "historical data" can best be offered by an entity that actively participated in the writing of every aspect of that history.

Disputes regarding the numerous national regulatory authorities of the NANP countries require sophisticated negotiation skills, a working knowledge of the political terrain of the NANP countries, an existing rapport with staff at the regulatory authorities, and experience/expertise